

1  
2 THE HONORABLE JAMES L. ROBART  
3  
4  
5  
6

7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 HANY VELETANLIC,

14 Defendant.

15 No. CR18-162 JLR

16 MOTION TO MODIFY  
17 CONDITIONS OF RELEASE

18 NOTE ON MOTION CALENDAR:  
19 December 21, 2018

20 The Defendant, Hany Veletanlic, by and through his attorney, John Henry  
21 Browne, submits this Motion to Modify Conditions of Release. Mr. Veletanlic is  
22 requesting the removal of stand-alone location monitoring and drug and alcohol  
23 testing. Pretrial services indicates that it has no objection to the removal of the  
24 drug and alcohol testing condition and will defer to the court on removing the  
25 location monitoring requirement.

26 Mr. Velantanlic is charged by Indictment with various firearm related  
offenses. Dkt. #30. On May 8, 2018, a detention hearing was held, and Mr.  
Velantanlic was placed on bond with special conditions. Dkt. #12. For the last  
seven months Mr. Veletanlic has faithfully complied with his release conditions.  
He has submitted to drug testing both with pretrial services and with his treating  
psychiatrist. He has complied with location monitoring and computer monitoring.

The location monitoring ankle bracelet, however, is giving him problems and is no longer necessary. Mr. Veletanlic has successfully demonstrated his willingness to comply with travel restrictions and is not a flight risk. The drug and alcohol testing requirement is duplicitous to the drug testing administered by his psychiatrist.

For the reasons stated above, the defense respectfully requests that the court remove the location monitoring and drug and alcohol testing conditions of Mr. Veletanlic's pretrial release.

DATED this 12th day of December 2018.

Respectfully submitted,

s/ John Henry Browne  
JOHN HENRY BROWNE, WSBA #4677  
Attorney for Hany Veletanlic  
Email: johnhenry@jhblawyer.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of December 2018, I electronically filed Defendant Hany Veletanlic's the pleading above with the clerk of the court using the CM/ECF system which will send notification of such filing to all the parties(s) of records. I hereby certify that I have served any other parties of record that are non-CM/ECF participants via Tele-fax/U.S. Postal mail.

s/ Lorie Hutt  
Lorie Hutt, Paralegal  
Law Offices of John Henry Browne, P.S.  
Email: [lorie@jhblawyer.com](mailto:lorie@jhblawyer.com)